

IN THE UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF ILLINOIS
URBANA DIVISION

FILED

OCT - 3 2017

CLERK OF THE COURT
U.S. DISTRICT COURT
CENTRAL DISTRICT OF ILLINOIS

UNITED STATES OF AMERICA,)
)
 Plaintiff,)
)
 vs.)
)
 BRENDT A. CHRISTENSEN,)
)
 Defendant.)

Case No. 17-CR-20037

Title 18, United States Code,
Sections 1001 & 1201(a)(1)

**SUPERSEDING
INDICTMENT**

COUNT 1

(Kidnapping Resulting in Death)

THE GRAND JURY CHARGES:

On or about June 9, 2017, in Champaign County, in the Central District of Illinois,

BRENDT A. CHRISTENSEN,

defendant herein, willfully and unlawfully seized, confined, inveigled, decoyed, kidnapped, abducted, and carried away Y.Z., and otherwise held her for his own benefit and purpose, and used and caused to be used a means, facility, and instrumentality of interstate commerce, namely, a Motorola cellular telephone and a Saturn Astra motor vehicle, in committing and in furtherance of the commission of the offense, which resulted in the death of Y.Z.

In violation of Title 18, United States Code, Section 1201(a)(1).

COUNT 2
(False Statement)

THE GRAND JURY CHARGES:

On or about June 12, 2017, in Champaign County, in the Central District of Illinois,

BRENDT A. CHRISTENSEN,

defendant herein, willfully and knowingly made a materially false, fictitious, and fraudulent statement and representation in a matter within the jurisdiction of the executive branch of the Government of the United States, by stating to Federal Bureau of Investigation ("FBI") Special Agents Joel Smith and Michael Carter that he stayed at his apartment and slept and played video games all day on June 9, 2017, when he knew full well that he drove around the University of Illinois campus in the afternoon of June 9, 2017, and picked up Y.Z. as she was waiting for a bus.

In violation of Title 18, United States Code, Section 1001(a)(2).

COUNT 3
(False Statement)

THE GRAND JURY CHARGES:

On or about June 15, 2017, in Champaign County, in the Central District of Illinois,

BRENDT A. CHRISTENSEN,

defendant herein, willfully and knowingly made a materially false, fictitious, and fraudulent statement and representation in a matter within the jurisdiction of the executive branch of the Government of the United States, by stating to Federal Bureau

of Investigation ("FBI") Special Agent Anthony Manganaro that he dropped off an Asian female in a residential area shortly after picking her up in his Saturn Astra on June 9, 2017, when he knew full well that he did not drop the female off shortly after picking her up, but instead, took her back to his apartment.

In violation of Title 18, United States Code, Section 1001(a)(2).

NOTICE OF SPECIAL FINDINGS

THE GRAND JURY CHARGES:

1. The allegations of Count 1 of this Superseding Indictment are hereby realleged and incorporated herein by reference.
2. As to Count 1 of this Indictment,

BRENDT A. CHRISTENSEN,

defendant herein:

- a. Was more than 18 years of age at the time of the offense (18 U.S.C. § 3591(a));
- b. Intentionally killed Y.Z. (18 U.S.C. § 3591(a)(2)(A));
- c. Intentionally inflicted serious bodily injury that resulted in the death of Y.Z. (18 U.S.C. § 3591(a)(2)(B));
- d. Intentionally participated in an act, contemplating that the life of a person would be taken or intending that lethal force would be used in connection with a person, other than one of the participants in the offense, and the victim died as a direct result of the act (18 U.S.C. § 3591(a)(2)(C)); and

e. Intentionally and specifically engaged in an act of violence, knowing that the act created a grave risk of death to a person, other than one of the participants in the offense, such that participation in the act constituted a reckless disregard for human life and the victim died as a direct result of the act (18 U.S.C. § 3591(a)(2)(D)).

3. As to Count 1 of this Superseding Indictment:

- a. Y.Z.'s death occurred during the commission of a kidnapping in violation of Title 18, United States Code, Section 1201 (18 U.S.C. § 3592(c)(1));
- b. **BRENDT A. CHRISTENSEN** committed the offense in an especially heinous, cruel, or depraved manner, in that it involved torture or serious physical abuse to the victim (18 U.S.C. § 3592(c)(6));
- c. **BRENDT A. CHRISTENSEN** committed the offense after substantial planning and premeditation to cause the death of a person (18 U.S.C. § 3592(c)(9)).

A TRUE BILL.

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FOREPERSON

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PATRICK D. HANSEN
Acting United States Attorney

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